

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KALOMA CARDWELL,

Plaintiff,

v.

**DAVIS POLK & WARDWELL LLP, Thomas Reid,
John Bick, and Daniel Brass,**

Defendants.

1:19-cv-10256-GHW

**NOTICE OF PLAINTIFF'S MOTION *IN LIMINE*
RE: SPOILIATION OF EVIDENCE**

Please take notice that plaintiff Kaloma Cardwell, by and through his undersigned counsel, upon the accompanying Memorandum of Law and the Declaration of David Jeffries dated September 15, 2023 and accompanying exhibits, will move this Court at the United States Courthouse, 500 Pearl Street, New York, New York, for an Order pursuant to Rule 37 of the Federal Rules of Civil Procedure imposing sanctions and other relief against Defendants Davis Polk, Reid, and Bick in the above-captioned action for the reasons set forth in the accompanying Memorandum of Law, and for such other and further relief as the Court deems just and proper.

Dated: September 15, 2023
New York, New York

Respectfully submitted,

By: /s/ David Jeffries
David Jeffries

1345 Avenue of the Americas 33rd Flr
New York, New York 10105
(212) 601-2770

Djeffries@jeffrieslaw.nyc

Attorney for Plaintiff